UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

United States of America,

v.

Case: 2:23-cr-20179 Judge: Lawson, David M. MJ: Grand, David R.

Edward Lee Dickerson

Filed: 03-21-2023 At 03:57 PM

IND USA V EDWARD LEE DICKERSON (SS)

Defendant.

Indictment

The Grand Jury charges that:

Count One Possession of Heroin with Intent to Distribute 21 U.S.C. § 841(a)(1)

On or about March 14, 2023, in the Eastern District of Michigan, the defendant, Edward Lee Dickerson, knowingly and intentionally possessed with intent to distribute a controlled substance, that is a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

Count Two Possession of Cocaine with Intent to Distribute 21 U.S.C. § 841(a)(1)

On or about March 14, 2023, in the Eastern District of Michigan, the defendant, Edward Lee Dickerson, knowingly and intentionally possessed with intent to distribute a controlled substance, that is a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

Count Three Possession of Cocaine Base with Intent to Distribute 21 U.S.C. § 841(a)(1)

On or about March 14, 2023, in the Eastern District of Michigan, the defendant, Edward Lee Dickerson, knowingly and intentionally possessed with intent to distribute a controlled substance, that is a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

Count Four Possession of Fentanyl with Intent to Distribute 21 U.S.C. § 841(a)(1)

On or about March 14, 2023, in the Eastern District of Michigan, the defendant, Edward Lee Dickerson, knowingly and intentionally possessed with intent to distribute a controlled substance, that is a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as

fentanyl in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

Count Five Possession of a Stolen Firearm 18 U.S.C. § 922(j)

On or about March 14, 2023, in the Eastern District of Michigan, the defendant, Edward Lee Dickerson, knowingly possessed a stolen firearm, that is, a 9-millimeter, Glock 19 pistol and a .223-caliber, Bushmaster AR-15-style rifle, which had been shipped and transported in interstate commerce, knowing and having reasonable cause to believe the firearm was stolen, in violation of Title 18, United States Code, Section 922(j).

Count Six Possession of a Firearm in Furtherance of a Drug-Trafficking Crime 18 U.S.C. § 924(c)(1)(A)

On or about March 14, 2023, in the Eastern District of Michigan, the defendant, Edward Lee Dickerson, knowingly possessed a firearm, that is, a 9-millimeter, Glock 19 pistol, a .223-caliber, Bushmaster AR-15-style rifle, and a .38-caliber, Charter Arms revolver, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of

the United States, that is, possession with intent to distribute a controlled substance, as charged in Counts One through Four of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A).

Forfeiture Allegations

The allegations contained in Counts One through Six of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture under Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853.

Under Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of the offense in violation of Title 18, United States Code, Sections 922(j) and 924(c) set forth in Counts Five and Six of this Indictment, the defendant, shall forfeit to the United States of America, any firearm or ammunition involved in or used in any knowing violation of the offense, including, but not limited to:

- One 9-millimeter, Glock 19 pistol and all related ammunition;
- One .38-caliber, Charter Arms revolver and all related ammunition; and
- One .223-caliber, Bushmaster AR-15-style rifle and all related ammunition.

Under Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendant, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

As part of the forfeiture in this case, the United States intends to seek entry of a forfeiture money judgment.

If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

This is a True Bill.

<u>/s/ Grand Jury Foreperson</u>
Grand Jury Foreperson

DAWN N. ISON United States Attorney

<u>/s/ Brandy R. McMillion</u> Chief, General Crimes Unit

<u>/s/ Hank Moon</u>
Assistant United States Attorney

/s/ Louis F. Meizlish
Assistant United States Attorney

Dated: March 21, 2023

United States District Court Eastern District of Michigan	Criminal Case (Case: 2:23-cr-20179		
NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to		Judge: Lawson, David M. MJ: Grand, David R. Filed: 03-21-2023 At 03:57 PM IND USA V EDWARD LEE DICKERSON (SS)		
Companion Case Information)	Companion C	ase Number.	
This may be a companion case based upon LCrR 57.10 (b)(4)1:		Judge Assigned:		
☐ Yes ⊠ No		AUSA's Initials:		
Case Title: USA v. Edward	Dickerson			
County where offense occ	urred : Wayne			
Check One: ⊠Felony	□Mis	demeanor	□Petty	
Indictment/Info	ormation no prior comormation based upon ormation based upon	prior complaint	[Case number: 23-mj-30109] complete Superseding section below].	
Superseding Case Information	on			
Superseding to Case No:		Judge:		
Involves, for plea purpos	tional charges or defenda ses, different charges or a matter but adds the addi	adds counts.	ts or charges below:	
Defendant name	Cha	ırges	Prior Complaint (if applicable)	
Please take notice that the below the above captioned case. March 21, 2023 Date	Hank Moo Assistant Ui 211 W. Foi Detroit, MI Phone: (31)			
		ress: Hank.Mo ar #: P85337	oon@usdoj.gov	

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.